

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
v.) No. 16-cr-10094-LTS
ROSS MCLELLAN,)
Defendant)

ASSENTED-TO MOTION TO TEMPORARILY MODIFY CONDITIONS OF RELEASE

Now comes the Defendant, Ross McLellan, by and through undersigned counsel, and hereby respectfully moves this Honorable Court for an Order temporarily modifying his present conditions of release, Dkt. 11, to allow Mr. McLellan's wife to refinance the family residence and obtain a \$350,000 mortgage that would be used to pay off the balance of and replace the family's current \$200,000 line of credit and would allow the family to use equity from their home to cover future household expenses.

As grounds and reasons therefore. Mr. McLellan states the following:

1. On April 6, 2016, Mr. McLellan was ordered released on conditions that were secured by a \$250,000 property bond, Dkt. 22. The bond was secured by a deed, an escrow agreement, and a mortgage (in favor of the Clerk for the District Court of the District of Massachusetts) to the family's home in Hingham, MA. This bond was continued pending appeal;¹

2. Mr. McLellan has fully complied with all of his conditions of release;

¹ The Hingham, MA property is held in fee-simple by Ms. McLellan.